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March 27, 2023

Judge Nicholas G. Garaufis United States District Court 225 Cadman Plaza East Brooklyn, New York 11201 VIA ECF

> RE: United States v. Michael Mancuso CR No. 05-CR-60 Violation of Supervised Release Hearing Reason for Adjournment Request (Seventh) Currently Scheduled Date: 4/14/23 at 10:30 a.m.

Your Honor:

The Government takes no position on this application. The defense is requesting an adjournment of our hearing date from April 16, 2023 to either May 11th, 12th, 15th or 16th, 2023. Counsel is due to begin trial in the Northern District of New York on April 17, 2023. This matter was scheduled prior to this matter and when we took the April 14th date I did not realize I would need to move to Albany in advance of the April 14, 2023 date. Secondly, I await business certification for some of the defense evidence and the necessary proprietor is away I understand until next week. This will be part of the defendant's reciprocal discovery. Lastly there were issues accessing the last discovery production which I with Mr. Gibaldi was able to access today. There are items which are still not, however, accessible.

My apologies for this final request. We look forward to your word.

Most respectfully,

Stace Richman

cc AUSA Michael Gibaldi, <u>Gibaldi.Michael@usdoj.gov</u> AUSA James McDonald, <u>MacDonald.James@usdoj.gov</u> Ryan Lehr@nyep.uscourts.gov

and via ECF